



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 7, 2025

By ECF

Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Chung v. Trump*, 25-cv-2412 (NRB)

Dear Judge Buchwald:

This Office represents the government in the above-referenced matter. On April 11, 2025, the government filed a combined motion to dismiss and opposition to the plaintiff's motion for a preliminary injunction; the plaintiff filed her opposition to the motion to dismiss on April 29, 2025, and the government's reply in further support of its motion to dismiss is currently due this Friday, May 9, 2025. Stipulation and Order (ECF No. 38). A show cause hearing on the plaintiff's motion for a preliminary injunction is scheduled for May 20, 2025. Order to Show Cause (ECF No. 20). On behalf of the government, we write respectfully to request a three-business-day extension of time to file the government's reply, until 5:00 p.m. on Wednesday, May 14, 2025.

We make this request because additional time is needed for the government to assess an opinion issued earlier today by the Second Circuit in *Ozturk v. Hyde*, --- F.4th ----, 2025 WL 1318154 (2d Cir. May 7, 2025), as well as its potential effect on this case. Plaintiff's counsel consents to this request. This is the government's first request for an extension of any deadline in this case.

We thank the Court for its consideration of this request.

Respectfully submitted,

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Southern District of New York

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cc: Counsel of Record (by ECF)